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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

UNITED STATES OF AMERICA : Case No. 1:21 CR 44  
:   
v. : Violations: 18 U.S.C. § 115(a)(1)(B)  
: 18 U.S.C. § 875(b)  
DYLAN STEPHEN JAYNE : 18 U.S.C. § 875(c)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about September 2, 2019, in the Western District of Virginia and elsewhere, DYLAN STEPHEN JAYNE, knowingly threatened to assault and murder a United States official, specifically a United States Senator, with intent to intimidate and interfere with such official while engaged in the performance of official duties and with intent to retaliate against such official on account of the performance of official duties.
2. On or about September 2, 2019, DYLAN STEPHEN JAYNE called the office of a United States Senator and left a voicemail stating “Agent director at your FBI for [Senator], I leave you a message today on a work holiday. You have Dylan Jayne’s money for social security on that contractor. You put his money in the bank right now or else . . . You do any more inviting for me and I’m going to fucking kill your ass by someone else,” or words to that effect.
3. All in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

COUNT TWO

The Grand Jury charges that:

1. On or about September 2, 2019, in the Western District of Virginia and elsewhere, DYLAN STEPHEN JAYNE, with intent to extort from a person any money or other thing of value, knowingly

transmitted in interstate commerce a communication containing a threat to injure the person of another.

2. On or about September 2, 2019, DYLAN STEPHEN JAYNE called the office of a United States Senator and left a voicemail stating "Agent director at your FBI for [Senator], I leave you a message today on a work holiday. You have Dylan Jayne's money for social security on that contractor. You put his money in the bank right now or else . . . You do any more inviting for me and I'm going to fucking kill your ass by someone else," or words to that effect.

3. All in violation of Title 18, United States Code, Section 875(b).

COUNT THREE

The Grand Jury charges that:

1. On or about September 2, 2019, in the Western District of Virginia and elsewhere, DYLAN STEPHEN JAYNE, knowingly transmitted in interstate commerce a communication containing a threat to injure the person of another.

2. On or about September 2, 2019, DYLAN STEPHEN JAYNE called the office of a United States Senator and left a voicemail stating "Agent director at your FBI for [Senator], I leave you a message today on a work holiday. You have Dylan Jayne's money for social security on that contractor. You put his money in the bank right now or else . . . You do any more inviting for me and I'm going to fucking kill your ass by someone else," or words to that effect.

3. All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL, this 8 day of September, 2021.

/s Grand Jury Foreperson

Recd Svc for Daniel P. Bubar  
DANIEL P. BUBAR  
Acting United States Attorney

*United States v. Dylan Stephen Jayne*

USAO 2020R00330